

EXHIBIT “A-8”

JULIO GARZA
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93-96

<p>Page 93</p> <p>1 Q. Isn't that the title of the document 2 that's Exhibit 17? 3 A. Correct. 4 Q. Past summary and outcome? 5 A. That is correct. 6 Q. Okay. And so this is a document that 7 you downloaded after you had been offered a job 8 at Array and after you had handed your 9 resignation letter to NOV, right? 10 A. Based on the provided information, yes. 11 Q. And, again, you don't quibble with 12 what -- at this point what -- 13 A. You can't, right? It's written, right? 14 It's on the document that's in front of me, 15 correct. 16 Q. And I think you said before that you 17 don't quarrel with the fact that this isn't -- I 18 don't want to put words in your mouth. I 19 apologize. 20 A. Well, it's a report that NOV generated, 21 right? 22 Q. Correct. 23 A. Like those documents may or may not 24 still be on the thumb drive, and it still hasn't 25 been proven, so -- but this is a document that</p>	<p>Page 95</p> <p>1 documents, they still retain reference 2 information. Now, the argument is that if 3 they're confidential -- 4 MR. ISRAEL: I don't think he 5 asked you a question. 6 THE WITNESS: Sorry. 7 Q. (BY MR. LAPP) And that's really -- 8 that's really the issue, right, whether -- 9 whether what you took is confidential information 10 or not, right? 11 A. Correct. That's the argument. 12 Q. And you have acknowledged today that 13 some of what you took falls at least within the 14 definitional framework of the agreement that you 15 signed with NOV as to what company confidential 16 information is, right? 17 A. Right. 18 MR. ISRAEL: Object to the form. 19 Q. (BY MR. LAPP) Are you familiar with 20 technical aspects of the computer and a thumb 21 drive to know enough about what information can 22 be gleaned by the technician who looks at the 23 computer -- this is a really, really bad 24 question. I'm going to start over because he's 25 going to object.</p>
<p>Page 94</p> <p>1 shows activities that were on my laptop to a 2 thumb drive so -- but -- 3 Q. And to the best of your recollection as 4 you sit here today, you recall taking that 5 document, Exhibit Number 17, the past summary and 6 outcomes with Keller Newton, and putting it on 7 your thumb drive. 8 A. That's what the report states, yes. 9 Q. I'm not asking you about the report. 10 I'm asking you if you recall having done that. 11 A. It may have happened, yes. 12 Q. Okay. Again, that's not the question I 13 asked you. What I asked you was, if you recall 14 having done that. 15 A. No. 16 Q. Do you recall having done any of this, 17 and by "any of this" I mean taking the documents, 18 the files that are reflected on Exhibit 2 and 19 transferring them to a thumb drive, any of them. 20 A. Yes. I remember transferring some 21 files, yes. Some of them were like the reference 22 information, right? 23 Q. And in fairness, some of them are not, 24 right? 25 A. I would probably agree, yes. And these</p>	<p>Page 96</p> <p>1 I think you testified earlier 2 today that, at least with regard to the subject 3 device, the black and gray thumb drive with a 4 snap-on lid, you think that may have been plugged 5 into the Array laptop. 6 A. Correct. 7 Q. Okay. Isn't it true that in order to 8 confirm that one would have to actually look at 9 the Array laptop and say, oh, yeah, here's the 10 unique identifier for the thumb drive, here is 11 what was plugged into this computer? 12 MR. ISRAEL: Object to the form. 13 A. I would have to say that that's how -- 14 I'm not sure. I'm not sure how that works. 15 Q. (BY MR. LAPP) Okay. 16 A. I'm not a computer engineer, sir. 17 Sorry. 18 Q. I'm not even a mechanical engineer 19 so -- 20 A. Sometimes I say I'm not a mechanical 21 engineer myself either, but -- 22 Q. So do you know enough about computers 23 and computer engineering to even be able to 24 answer any questions about what you have to look 25 at to be able to figure out what was plugged into</p>

admits the
usb was
plugged into
the Array
laptop

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<p style="text-align: right;">Page 97</p> <p>1 where and when?</p> <p>2 A. No, sir. 'M sorry, I wouldn't know.</p> <p>3 Q. When the thumb drive that you took from</p> <p>4 NOV was plugged into the Array laptop, did you</p> <p>5 download files off that thumb drive?</p> <p>6 A. I guess I would like to clarify that I</p> <p>7 didn't take the thumb drive from NOV. It was my</p> <p>8 thumb drive. And it had information in it that</p> <p>9 was reference information.</p> <p>10 Q. Okay. So with that explanation, can</p> <p>11 you answer my question?</p> <p>12 A. What was your question again?</p> <p>13 Q. Did you transfer any information that</p> <p>14 was on that thumb drive onto the Array laptop</p> <p>15 computer?</p> <p>16 A. Not any that was confidential, not</p> <p>17 that -- based on their definition, no, I did not</p> <p>18 download any information onto an Array laptop.</p> <p>19 Now, I'm not saying I didn't download a file, but</p> <p>20 that file did not belong to NOV.</p> <p>21 Q. And in order to determine what actually</p> <p>22 was downloaded, we'd need to look at the Array</p> <p>23 laptop computer, wouldn't we?</p> <p>24 MR. ISRAEL: Object to form.</p> <p>25 A. I'm not a computer engineer so it would</p>	<p style="text-align: right;">Page 99</p> <p>1 A. I would have to talk to counsel.</p> <p>2 Q. (BY MR. LAPP) Okay. Are you aware</p> <p>3 that since June 4th, 2022, NOV has been asking to</p> <p>4 see what's on that thumb drive?</p> <p>5 A. I have not been given any of that</p> <p>6 information.</p> <p>7 MR. LAPP: Let's take a short</p> <p>8 break.</p> <p>9 THE VIDEOGRAPHER: We're off the</p> <p>10 record. The time is 11:43.</p> <p>11 (Recess taken 11:43 to 12:01)</p> <p>12 individuals</p> <p>13 THE VIDEOGRAPHER: We're back on</p> <p>14 the record. The time is 12:01.</p> <p>15 Q. (BY MR. LAPP) Mr. Garza, when you</p> <p>16 received notice that this lawsuit had been filed</p> <p>17 and that a restraining order had been issued</p> <p>18 against you, who did you notify at Array of the</p> <p>19 lawsuit?</p> <p>20 A. The first person I spoke to was my</p> <p>21 direct manager, Todd Henderson.</p> <p>22 Q. And do you recall what day that was?</p> <p>23 A. No, but it was on Friday. I do recall</p> <p>24 that. It was the Friday -- the afternoon I was</p> <p>25 going to be with my family when I saw it.</p>
<p style="text-align: right;">Page 98</p> <p>1 be hard to answer that. Go ahead.</p> <p>2 Q. (BY MR. LAPP) And I'm not a computer</p> <p>3 engineer either.</p> <p>4 A. Right.</p> <p>5 Q. Would you agree with me that we have to</p> <p>6 talk to a computer engineer or a computer</p> <p>7 forensics person to be able to answer that</p> <p>8 question?</p> <p>9 A. Correct.</p> <p>10 Q. And would you agree with me that the</p> <p>11 best way to determine definitively what got</p> <p>12 plugged in, when it got plugged in, what, if</p> <p>13 anything, got moved would be to look at the thumb</p> <p>14 drive and look at the computer?</p> <p>15 MR. ISRAEL: I object to the form.</p> <p>16 A. I wouldn't be able to answer that.</p> <p>17 Sorry.</p> <p>18 Q. (BY MR. LAPP) Would you have an issue</p> <p>19 or problem allowing a computer engineer or</p> <p>20 qualified person to look at the device and make</p> <p>21 that determination?</p> <p>22 MR. ISRAEL: Again, I'm going to</p> <p>23 object to the extent it gets to the defense</p> <p>24 strategy and that's a decision to be made between</p> <p>25 counsel and the client.</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. What -- tell me about the conversation</p> <p>2 you had with Todd.</p> <p>3 A. Well, I thought it was spam initially,</p> <p>4 so I was asking him if he was aware that we were</p> <p>5 getting sued, Array, and he said, I don't know.</p> <p>6 And then we started -- I didn't open any of the</p> <p>7 files just because I wasn't sure if they were</p> <p>8 spam or viruses or whatever, right?</p> <p>9 So we identified a person that had</p> <p>10 been cc'd on there, and then that's when Todd</p> <p>11 said, yeah, it might be legit, because of the</p> <p>12 person that was on the -- cc'd on the lawsuit,</p> <p>13 which is one of Array's counsel, and then that's</p> <p>14 when we realized it.</p> <p>15 Then I still didn't open anything.</p> <p>16 We kind of -- I was told just wait until we</p> <p>17 talked to the person cc'd on the email.</p> <p>18 Q. You mentioned earlier today about</p> <p>19 somebody from Array who is in Utah. Does Array</p> <p>20 have an office in Utah?</p> <p>21 A. I'm not sure. That person was Todd</p> <p>22 that I mentioned --</p> <p>23 Q. Okay.</p> <p>24 A. -- and he works remotely.</p> <p>25 Q. And does he live in Utah and work</p>

won't deny that
he downloaded
files onto
Array laptop